

# EXHIBIT 18

|   |   |                    |
|---|---|--------------------|
| -----X                                      |   |                    |
| ULTIMA SERVICES CORPORATION,                | : |                    |
|   | : |                    |
| Plaintiff,                                  | : |                    |
|   | : |                    |
| -against-                                   | : | No. 2:20-cv-00041- |
|   | : | DCLC-CRW           |
| U.S. DEPARTMENT OF AGRICULTURE,             | : |                    |
| U.S. SMALL BUSINESS ADMINISTRATION,         | : |                    |
| SECRETARY OF AGRICULTURE, and ADMINISTRATOR | : |                    |
| OF THE SMALL BUSINESS ADMINISTRATION,       | : |                    |
|   | : |                    |
| Defendants.                                 | : |                    |
|   | : |                    |
| -----X                                      |   |                    |

Plaintiff identifies the following matters for examination pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure:

- Case 2:20-cv-00041-DCLC-CRW Document 65-2 Filed 06/21/22 Page 2 of 3  
PageID #: 1772

6. The process for assigning a NAICS code to each requirement or contract accepted into the 8(a) BD program, including contracts or requirements for providing administrative and technical services to NRCS offices.

7. Factors or considerations relating to the renewal of contracts or requirements, or the exercise of options in contracts, including any contracts with Plaintiff.

8. Factors or considerations used to set goals for the USDA for Small Disadvantaged Businesses (SDBs), including 8(a) BD participants, and any efforts within USDA and the procedures used to track actual utilization of SDBs at USDA and its various agencies.

9. The proportion of USDA contracting dollars that, since 2015, have gone to prime contractors and subcontractors both within and without the 8(a) BD program.

10. Any plan or program developed or promulgated pursuant to Executive Order 12432 for promoting the development of minority-owned businesses or reports to the Secretary of Commerce pursuant to Section 3 of Executive Order 11625.

11. Documents concerning contracts produced by USDA in this lawsuit.

12. Contact information for any former employees of USDA familiar with the foregoing topics.

Dated: March 3, 2022

Michael E. Rosman

Michael E. Rosman

Michelle A. Scott

CENTER FOR INDIVIDUAL RIGHTS

1100 Connecticut Ave, NW, Ste. 625

Washington, D.C. 20036

(202) 833-8400

M. Dale Conder, Jr.

RAINEY KIZER REVIERE & BELL PLC

209 E. Main St.

Jackson, TN 38301

(731) 426-8130